

JUL 25 2014

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Erien L. Frazier,

Plaintiff,

VS.

RJM Acquisitions LLC,

Defendant

Case No.: 1:14-CV-00047-WDQ

[Pleading Title]

## PLAINTIFF'S RESPONSE TO DEFENDANT RJM ACQUISITIONS LLC FIRST SET OF

## INTERROGATORIES

PROPOUNDING PARTY: Defendant, RJM ACQUISITIONS, LLC

RESPONDING PARTY: Plaintiff, ERIEN FRAZIER

SET NUMBER: ONE(1)

## PRELIMINARY STATEMENT

Discovery is ongoing at this time, and Plaintiff Erien Frazier ("Plaintiff") reserves the right to amend its responses if additional facts, documents, or information is discovered. The following responses are given solely for the purpose of this litigation, and without prejudice to Plaintiff's right to produce or introduce evidence of subsequently discovered documents and facts.



Plaintiff has not yet completed its investigation of facts relating to this litigation, nor has it completed discovery in this action or preparation for trial. Therefore, the following responses are given without prejudice to its right to amend, supplement or modify such responses, and are subject to Plaintiff's right to produce at the time of trial or otherwise, subsequently discovered evidence related to the proof of any material facts and to produce all evidence whenever discovered relating to the proof of facts subsequently discovered to be material. Plaintiff's responses are made in good faith effort to supply as much factual information as presently known.

As general objections, Plaintiff objects to any information which is protected as confidential or proprietary information. This preliminary statement and the above objections are incorporated in each and every response as set forth below.

#### **PRELIMINARY OBJECTIONS**

Without waiving the force or effect of the foregoing objections, Plaintiff's responses and objections to the interrogatories are made solely for the purposes of this action. Each response, if any, is subject to any and all objections as to competence, relevance, materiality, propriety, and admissibility, and any and all objections and grounds that would require the exclusion from evidence of any statement or other matter contained in any response. All objections and grounds are thereby reserved and may be interposed at the time of trial.

The following responses are made on information presently available to Plaintiff, and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby.

The fact that Plaintiff has responded to or objected to any demand or a part thereof should not be taken as an admission that Plaintiff admits or accepts the existence of any facts set forth or assumed by such demand, or that such response or objection or document or thing produced constitutes relevant or admissible evidence. The fact that Plaintiff has responded to part or all of any such demand is not intended and shall not be construed to be a waiver by Plaintiff of all or any part of any objections to any such interrogatory made by defendant.

**RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 1:**

Describe in full evidentiary detail, all facts which EVIDENCE YOUR cause of action for violation of 15 U.S.C. Section 1692, et seq., Fair Debt Collection Practices Act ("FDCPA").

**ANSWER:**

Plaintiff did not intend to state a FDCPA claim in her Complaint. That was a mistake.

**INTERROGATORY NO. 2:**

IDENTIFY all PERSONS who have knowledge of any matter which EVIDENCE YOUR cause of action for violation of the FDCPA.

**ANSWER:**

There is none.

**INTERROGATORY NO. 3:**

Describe, in full evidentiary detail, all facts which EVIDENCE YOUR cause of action for negligent violation of 15 U.S.C. Section 1681, et seq., Fair Credit Reporting Act ("FCRA").

**ANSWER:**

If you contend that the debt which is the subject of YOUR Complaint is not YOUR debt, state whether YOU advised DEFENDANT that the debt was not YOUR debt, how this was communicated to DEFENDANT, and the date of the communication.

**ANSWER:**

The subject of Plaintiff's Complaint is not debt. Plaintiff communicated to Defendant in a December 18, 2013 email that she did not nor has she ever owed Defendant a debt.

**INTERROGATORY NO. 21:**

If you contend that the debt which is the subject of YOUR Complaint is not YOUR debt, state whether YOU requested verification of the debt from DEFENDANT, and the date of the request.

**ANSWER:**

The subject of Plaintiff's Complaint is not debt. The subject is RJM's non-permissible purpose of obtaining Plaintiff's consumer report.

**INTERROGATORY NO. 22:**

State YOUR residential address for the last ten (10) years, and the dates you lived at each address.

**ANSWER:**

Objection. This Interrogatory calls for information which is not relevant and not reasonably calculated to lead to the discovery of admissible evidence regarding any issue.

Dated: July 23, 2014

Erien Frazier

